



Massapequa Water District

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May 12, 2014

Steven M. Scharf, P.E.
Remedial Bureau A - Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233-0001

RE: Capture Zone Evaluation and Path Forward Report for the GM-38 Area Groundwater
Extraction, Treatment and Discharge System Report March 2014

NYD030485288

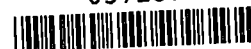
Dear Mr. Scharf:

Thank you for providing the Massapequa Water District with the opportunity to comment on the above captioned report. Accordingly we have formulated the following questions and comments:

- **OU2 definition of a hot spot:** As indicated in the report, a hot spot area is defined in the OU2 ROD as groundwater containing greater than 1 part per million (1,000 micrograms per liter) of volatile organic compounds (VOCs). As you are aware, the drinking water maximum contaminant level (MCL) for many of the volatile organic compounds detected in the plume has been established at 5 ppb. EPA is planning to take action over the next several years to further reduce MCLs for select VOCs. Clearly the hot spot criteria of 1,000 ppb is not acceptable for proactive drinking water protection. For example a VOC concentration of 900 ppb is 180 times above the current drinking water standard. How was this criteria established and how can it be considered appropriate for drinking water protection? Keep in mind that the EPA and New York State Department of Health required wellhead treatment to be a measure of last resort.
- **BCP OU3 Groundwater Plume:** The narrative on page 2-5 describes a high level of TVOCs (in excess of 2,000ppb) that is upgradient of GM-38 and will sink as it moves south. The report also states "By the time the BCP OU3 plume reaches the GM-38 Area.

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it is understood to be present at a depth greater than 550 feet, or below the maximum depth of the GM-38 Area Groundwater." We also note that the conclusions on Page 5-2 states *"The operation of this well can be discontinued and resources directed elsewhere."* The second paragraph does go on to state *"As a result, the Navy will continue to operate RW01 for now, but will discuss its future operation with New York State Department of Environmental Conservation (NYSDEC)."* We do not support the decommissioning of GM38 based on the documented upgradient high magnitude contamination. We strongly recommend that GM38 be modified and that deeper recovery wells be installed to address the high levels of VOCs found off site of Bethpage Community Park (BCP) and upgradient of GM38. We recognize that BCP is part of OU3 and GM38 is part of OU2, however since the plume is comingled integrated management and remediation measures must be implemented.

- **GM-38 Area Monitoring Wells /RW2 and RW3 Wells:** Pages 4-7 and 4-8 discusses evidence of a continuing shallow source of VOCs flowing into the GM-38 Area Groundwater. There is insufficient data in the shallow aquifer in this area to determine the extent or mass of VOCs associated with it. Page 5-2 in the conclusions states "The Navy will also discuss with NYSDEC additional investigation of the shallow aquifer (less than 550 feet bgs) to identify the continuing source of VOCs and other potentially responsible parties in the vicinity of GM-38." We trust that your Department will promptly follow-up on this and develop a plan of action.

Please feel free to contact me at (516) 798-5478 if you should have any questions or require any additional information.

Very truly yours,

MASSAPEQUA WATER DISTRICT



Stan Carey
Superintendent

cc:

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